IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

HALLIBURTON COMPANY,

Plaintiff,

v.

CIVIL NO: 4:24-ev-02149

UNITED STATES OF AMERICA,

Defendant.

DECLARATION OF KEITH S. GRIFFITH II PURSUANT TO 28 U.S.C. § 1746

Pursuant to 28 U.S.C. § 1746, I declare as follows:

- I am a revenue agent with the Internal Revenue Service, located in Houston, Texas. I
 am over 21 years of age, of sound mind, capable and competent of making this
 declaration possession in making the representations below.
- 2. I am a revenue agent supporting the Department of Justice in this case.
- 3. The Internal Revenue Service keeps filed tax returns as part of its official records.
- 4. A true and correct copy of the Plaintiff's 2010 Form 1120X, Amended U.S.
 Corporation Tax Return, but with required redactions and bates numbers for convenience added to the bottom right corner, is enclosed with this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed 10/24/2024.



Keith S. Griffith II IRS Revenue Agent



SENDER: COMPLETE THIS SECTION	(FORM 1120 X - NIGERIA) COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse 	A. Signature Agent Addressee
so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits.	B. Repelved by (Printed Name) C. Date of Delivery D. Is delivery address different from Item 1? □ Yes
1. Article Addressed to: Department of the Treasury Internal Revenue Service Center	
OGDEN, UT 84201-0012	3. Service Type Certified Mall Registered Return Receipt for Merchandise C.O.D.
114 C 1 1141 C 1116 C 1	4. Restricted Delivery? (Extra Fee) ☐ Yes
2. Article Number 7016 2710 (Transfer from service label)	0000 6384 6847
PS Form 3811, February 2004 Domestic Ret	urn Receipt 102595-02-M-1540

Form 112 (Rev. January 2) Department of the Internal Revenue S		Amended U.S Income T	S. C	Corporation Return		Fo 12 (Ent	omb No. 1545-0132 or tax year ending 2/2010 ter month and year.)
Name	burton Company	,			En	nployer	identification number
Type Number,		te no. (If a P.O. box, see instructions	3.)				
City or to	own, state, and ZIP code on, TX 77042				Те	lephone	number (optional)
Enter name and SAME	address used on origin	nal return (If same as above, write "S	Same.	")			
Internal Revenue where original re		-FILED					
	Fill in app	licable items and use	Part	II on the back to	explain a	ny ch	anges
Part I In	come and Dedu	ctions (see instructions)		(a) As originally reported or as previously adjusted	(b) Net char increase or (dec explain in P	crease) -	(c) Correct amount
1 Total inco	ome ,		1	4,224,686,244			4,224,686,244
2 Total ded	uctions		2	2,518,263,905	32,500	0,000	2,550,763,90
3 Taxable i	ncome. Subtract line	2 from line 1	3	1,706,422,339	-32,500	0,000	1,673,922,33
4 Total tax	والاطوع والملاطوري	i praja praha a prava prav	4	200,827,006	-11,37	5,000	189,452,006
Payments a	nd Credits (see	instructions)					
5a Overpayr	nent in prior year all	owed as a credit	5a	8,831,678			8,831,678
b Estimate	d tax payments		5b 5c	400,000,000		_	400,000,000
c Refund a	pplied for on Form 4 line 5c from the sum	1466	5d	408,831,678			408,831,678
		4	5e				
			5f				
g Credit fo	r federal tax on t	fuels and other refundable	5g	114,801			114,80
ciedits .	*****	31344431344434441	9				
6 Tax depo	sited or paid with (or	r after) the filing of the original	retur	n		, 6	
7 Add lines	Ed through 6 colum	ın (c)				7	408,946,479
		n on original return or as later a			*****	. 8	208,119,47
		and a second of the second					
	line 8 from line 7 Iverpayment (see i	instructions)			******	. 9	200,827,00
10 Tax due.	Subtract line 9 from	n line 4, column (c). If paying l		and the second of the second o	o the "United	10	
					421216	100	11 275 000
		, column (c), from line 9			2:::::	11	11,375,000
12 Enter the	The second secon	The state of the s		ated tax >	Refunded I	12 n, includin	11,375,000 g accompanying
Sign Here	schedules and staten (other than (axpayer)	rjury, I declare that I have filed an origin nents, and to the best of my knowledge is based on all information of which prep	and b	elief, this amended return is to as any knowledge.			President To
100 CANON 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Print/Type preparer's name	DI	re	9	2/18/18	Check self-emp	if PTIN played
Una Only	1401	& YOUNG U.S. LLP MCKINNEY STREET, SU	ITE	1200	-	Firm's E	no.
	HOUST	ON, TX 77010					817-348-6017

For Paperwork Reduction Act Notice, see instructions.

JSA 0C1820 3.000

817-348-6017 Form 1120X (Rev. 1-2011)

Form 1120X (F	lev. 1-2011) Page 2
Part II	Explanation of Changes to Items in Part I (Enter the line number from page 1 for the items you are changing, and give the reason for each change. Show any computation in detail. Also, see What To Attach in the instructions.)
If the change Carryback C	e is due to a net operating loss carryback, a capital loss carryback, or a general business credit carryback, see laims in the instructions, and check here
This ret	urn is being amended to report an increase in total deductions in the amount of
\$32,500,	000 (Part I, Line 2), resulting in a decrease in taxable income in the amount of
\$32,500,	000 (Part I, Line 3) and a decrease in total tax in the amount of \$11,375,000 (Par
I, Line	4). This amended return constitutes a claim for refund of \$11,375,000, plus
interest	as allowed by law.
The taxp	ayer ("Halliburton") paid \$35,000,000 to the Federal Government of Nigeria ("FGN")
in 2010	in settlement of certain matters. On its originally filed return, Halliburton
deducted	\$26,891,667 of this amount. During the IRS's audit of Halliburton's 2010 return,
Hallibur	con informally claimed an increased deduction in 2010 for the entire \$35,000,000
paid to	the FGN (i.e., an increase of \$8,108,333). At the conclusion of the IRS audit and
IRS Appea	als process, the IRS and Halliburton executed a Form 870-AD (which the Joint
Committee	on Taxation reviewed without objection) reflecting that Halliburton had overpaid
its 2010	income tax by \$63,523,156. This agreed overpayment took into account an allowed
deduction	of only \$2,500,000 out of the total \$35,000,000. The \$2,500,000 represented
payment 1	to the FGN to reimburse the FGN for its legal fees. On the Form 870-AD Halliburtor
expressly	reserved its rights to timely file and prosecute a claim for refund attributable
to a dedu	ection of the remaining \$32,500,000 of the \$35,000,000 (the "Settlement Payment").
This form	mal claim for refund is being filed pursuant to such reservation of rights.
The \$32,5	00,000 Settlement Payment is properly deductible by Halliburton in 2010 as an
ordinary	and necessary business expense under IRC Section 162(a). See the attached
statement	for additional explanation.

-U For	calendar year	2010 or tax year beginn	ion Incom	, ending		9M11
vice		► See	separate instru	ictions.	100	<u> </u>
mi seri	11					B Employer identification num
Print						
or				uctions.		C Date Incorporated
o.	and the second s		ard			11-07-1996
15)					- 1	D Total assets (see instructions
						\$ 14,616,892,0
E Check	if: (1)	Initial return (2)	Final return (3)			
						12,376,620,4
goods sold (Sch	nedule A, line 8)				2	8,587,457,5
profit. Subtract li	ine 2 from line 1	lc			3	3,789,162,9
ds (Schedule C,	line 19)				-	74,921,7
					1	167,423,7
ents						163,
oyalties					-	126,846,2
gain net income	a (attach Sched	lule D (Form 1120))			8	4,967,
or (loss) from	Form 4797, Pa	art II, line 17 (attach Form	4797)		9	52,765,5
come (see instr	ructions - attach	schedule)			10	8,435,
come. Add lines	s 3 through 10	erranie in inch	waters been seen	e commence en la		4,224,686,2
sation of officer	s (Schedule E,	line 4)			12	59,836,3
					13	422,548,4
					14	
nts					15	57,786,8
					16	66,229,7
					17	287,276,5
					18	447,750,9
					19	4,442,
ation from Form	1 4562 not clai	med on Schedule A or e	sewhere on return	(attach Form 4562)	20	1,131,623,8
					21	30,934,7
					22	10,283,3
, profit-sharing,	etc., plans		20201000		23	45,771,6
					24	74,778,4
c production ac	tivities deducti	on (attach Form 8903)			25	131,906,3
					26	-234,458,
					27	2,536,711,
					28	1,687,975,
				13,647,368		
				405,458	29c	14,052,8
				The state of the state of the	30	1,673,922,
		and the state of t			100	189, 452,
ayment credited		i				
		200,827,006				
d applied for on	1) (d Bat ▶ 32d	200,827,006		
		0.500.655.300.00	1 To			
	10397 8 4 4	(2) Form 4136				
	Form 3800 F				32h	200,827,
				unt owed	170	
						11,375,00
						11,375,00
enalties of perjury, inplete, Declaration of the period of	I declare that I have of preparer other th	examined this return, including a	accompanying schedule mation of which prepare	s and statements, and to the best of has any knowledge. The Procedure of the best of has any knowledge.	of my know	May the IRS discuss this ret With the preparer shown be (see instructions)? X Yes
		51	_	12/18/18	1	nployed
7		DUNG U.S. LLP			2 7 2 7	EIN >
mic name	KIND I W II					
			SUITE 1200		Phone	
	Print or type E Check apts 39, goods sold (Schorofit. Subtract lids (Schedule C, ents and maintenance) or (loss) from accome (see instructions and wages (less and maintenance) and licenses and maintenance and licenses and li	Print or 2107 Citype 39, 882, 304, goods sold (Schedule A, line 8) profit. Subtract line 2 from line 1 dis (Schedule C, line 19) ents oyalties gain net income (attach Schedule C, line 19) ents oyalties gain net income (attach Schedule C, line 19) ents oyalties gain net income (attach Schedule E, and wages (less employment of an and maintenance ents on of officers (Schedule E, and wages (less employment of an and maintenance ents on of officers (Schedule E, and wages (less employment of an and maintenance ents on of officers (Schedule E, and wages (less employment of an and maintenance ents on of officers (Schedule E, and wages (less employment of an and maintenance ents on of officers (Schedule E, and wages (less employment of an and wages (less employment of an and maintenance ents of profit sharing, etc., plans ents of perium declare in the sample of a spiled for on ents of perium of a spiled for on ents of perium of period spiled for on ents of perium of period spiled for on ents of perium, I declare that I have phelse. Declaration of period of	Print or type	Print or type	Name Halliburton Company Number, street, and oom or autien or. If a P.O. box, see instructions. 2107 City West Boulevard City or fown, state, and ZiP code Houston, TX 770 42 E Check K (1) Initial return (2) Final return (3) Name change (4) Na	Name Ralliburton Company Number, street, and room or aute no. If a P.O. box, see instructions. 2107 City West Boulevard 2107 City West Boulevard 2107 City West Boulevard 2107 City with street, and IP book 2107 City West Boulevard 2107 City of the street, and IP book 2107

	HALLIBURTON CO	ds Sold (see instructions)					Page
1	AND SOLD THE		NA PER L	100 2000	1		0
2							0
3							0
	Additional section 263A costs (attach schedule)			4		0
5	Other costs (attach schedule)	*******			5		8,587,457,539
6	Total. Add lines 1 through 5				6		8,587,457,539
7	Inventory at end of year				7		0
8	Cost of goods sold. Subtract	ine 7 from line 6. Enter here and	on page 1, line 2		8		8,587,457,539
9a					, ,		
	(i) Cost (ii) X Lor	wer of cost or market (iii)	Other (Specify	method used and	attach explanatio	0.) >	
b							▶□
C		thod was adopted this tax year for					▶ 🔲
d		as used for this tax year, enter pe			_		
	inventory computed under LIFC				9d	108,00	
8		ired for resale, do the rules of se					X Yes N
f		mining quantities, cost, or valuation	and the second second second second		Carlo		
				diam'r.			Yes N
1.4	Dividends ar	nd Special Deductions (se	e instructions)	(a) Dividends	(b) %	(c) Special deduction
					received		(a) x (b)
1		ed domestic corporations (other than d			579,226	70	405,458
2		d domestic corporations (other than de			0	80	
3		ock of domestic and foreign corp			0	instructions	
4		stock of less-than-20%-owned			0	42	
5		stock of 20%- or-more-owned p			0	48	
6		- owned foreign corporations and			D	70	
7		owned foreign corporations and			0	80	
8	Dividends from wholly owned to	foreign subsidiarles		+ · · ·	0	100	100 10
9		See Instructions for limitation		20	1000		405,456
0		prations received by a small busin				744	
		Small Business Investment Act of			0	100	
1	Dividends from affiliated group	members			0	100	
2	Dividends from certain FSCs				9,770,046	100	
3		ations not included on lines 3, 6,			23,478,654		
4_		corporations under subpart F (a			1,093,864	3. Pa	
5	Foreign dividend gross-up	dende anticolador de Bose 4 o		T E T	1,093,664	L	1
6		dends not included on lines 1, 2,			0		
7	Deduction for dividends said a	n certain preferred stock of publi	o utilities		220	Lu man	
8		rough 17, Enter here and on page			74,921,790	K	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
9		lines 9, 10, 11, 12, and 18. Ente				b.	405,450
0		on of Officers (see instruction					403,40
20		Schedule E only if total receipts (on page 1) are	\$500.000	or more.
_	(a) Name of officer	(b) Social security number			corporation	T	ount of compensation
	(a) Hallout difficult	(b) octal social () (lamber	(C) Percent of time devoted to business	(d) Common	(e) Preferred	(i) Amo	ount of compensation
4 D	etails Available in Tax Office		%	%			59,836,309
-			%	%	%		
		- 1 1	%	%	%		
			%	%	%		
			%	%			
			%	%			
_			%	%			
			%	%			
			%	%	%		1
			%	%	%	1	
2	Total compensation of officers				0		59,836,30
3	Compensation of officers claim	ed on Schedule A and elsewhere	on return	10000			-21737100
100		er the result here and on page 1,					59,836,30
4							

1 Check if the corporation is a men	ion (see instructions)						Page :
I Official the corporation is a men			Form 1120\\	▶ X		-	_
2 Income tax. Check if a qualified p					2	585,872	, 819
3 Alternative minimum tax (attach F		A STATE OF THE RESERVE OF THE STATE OF THE S			3		
4 Add lines 2 and 3					4	585,872	, 819
5a Foreign tax credit (attach Form 11		All 1 Am 7 A A Sept 2 A	5a 378,	421,890			
b Credit from Form 8834, line 29 .			5b				
c General business credit (attach Fo	orm 3800)		5c 17,5	98,923			
d Credit for prior year minimum tax			5d				
e Bond credits from Form 8912			5e				
6 Total credits. Add lines 5a throug	jh 5e		10000000	479.13	6	396,420	
7 Subtract line 6 from line 4			22,442,640		7	189,452	,006
8 Personal holding company tax (at	tach Schedule PH (Form 11	20))			8		
9 Other taxes. Check if from:	Form 4255	Form 8611	Form 8697				
				*			
	0.0000000000000000000000000000000000000	Form 8902	Other (attach	Compared to the Compared to th	9	100 450	000
10 Total tax. Add lines 7 through 9. I					10	189,452	,006
	tion (see instructions)			OC.			
1 Check accounting method: a L	Cash b X	Accrual c	Other (specify	()			es No
2 See the instructions and enter the:							
a Business activity code no. ▶ 213	l and Gas Field	Services					
b Busiless activity	lfield Services	DCIVICCS					
C Froduct of Service							x
3 Is the corporation a subsidiary in a If "Yes," enter name and EIN of the		Deal result a result.	X 12 2 2 2 2 2 3 3 1 1 1				- 25:
in res, enter havine and Eliv of the	e parent corporation =						
4 At the end of the tax year:							Ш
a Did any foreign or domestic of	corporation, partnership	(including any en	tity treated as a	partnershi	o), trust.	or tax-exempt	
organization own directly 20% or	요즘 이 아니는 얼마나 아니는 얼마나 나가 있다.		길이라. 이 등록 다음 전하면 그렇게요.	The same of the same			
corporation's stock entitled to vote	40 0 144 C. T					2012/2012/2012/2012/2012	X
b Did any individual or estate own					AGE OF A SECTION		
classes of the corporation's stock e						g power of all	
	corporation:			20) (attach S	chedule G	-	X
5 At the end of the tax year, did the o			Actions Control of	20) (attach S	chedule G	-	X
	, directly or indirectly, 50%	or more of the tot					X
5 At the end of the tax year, did the o			al voting power of	all dasses of	f stock ent	itled to vote of	x
5 At the end of the tax year, did the of a Own directly 20% or more, or own		1, Affiliations Sche	al voting power of dule? For rules of c	all dasses of	f stock ent	itled to vote of see instructions	x
At the end of the tax year, did the of a Own directly 20% or more, or own any foreign or domestic corporation	n not included on Form 85	1, Affiliations Sche	al voting power of	all dasses o	f stock ent wnership,	itled to vote of see instructions	X
At the end of the tax year, did the case of a Own directly 20% or more, or own any foreign or domestic corporation if "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of c	all dasses o	f stock ent wnership,	itled to vote of see instructions	X
At the end of the tax year, did the of a Own directly 20% or more, or own any foreign or domestic corporation if "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
At the end of the tax year, did the of a Own directly 20% or more, or own any foreign or domestic corporation if "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
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At the end of the tax year, did the case of a Own directly 20% or more, or own any foreign or domestic corporation of "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
At the end of the tax year, did the case of a Own directly 20% or more, or own any foreign or domestic corporation of "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
At the end of the tax year, did the case of a Own directly 20% or more, or own any foreign or domestic corporation if "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
At the end of the tax year, did the case of a Own directly 20% or more, or own any foreign or domestic corporation of "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
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At the end of the tax year, did the of a Own directly 20% or more, or own any foreign or domestic corporation if "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X
At the end of the tax year, did the of a Own directly 20% or more, or own any foreign or domestic corporation if "Yes," complete (i) through (iv).	n not included on Form 85	1, Affiliations Scher	al voting power of dule? For rules of o nployer ion Number	all dasses o	f stock ent wnership,	itled to vote of see instructions (iv) Percenta Owned in Vol	X

(Re	1118 December 2009)				Fax Credit - C See separate Instr h to the corporation	ructions	ns			ОМВ	No. 1545-0122
	rtment of the Treasury at Revenue Service		For calendar year 2010	, or other tax yea			ending				
Nan	e of corporation									Employer identification	number
	ALLIBURTON COMPANY	1 - 2 - 2 - 2 - 2		W- 14-15	VERNOUS VV AC	CVACC LIAMBON	4 - 4 4 - 14 - 17 - 17 - 17 - 17 - 17 -				
	ck only one box on e	ach form.	cable category of inc		e of Sanctioned Cou		1 or instructi	ons. Als	so, see Specific in	istructions.	
×	General Category In			OWNER.	y: Name of Country				- D. S		
50	hedule A Incom	e or (Loss) B	fore Adjustment	s (Report all an	nounts in U.S. do	llars. See Sp	ecific Instr	uction	is.)		
	Foreign Country or U.S. Possession (Enter two-letter code; see		Gross Income or (L	oss) From Source	s Outside the United	d States (INCLU	DE Foreign E	Branch	Gross Income he	re and on Schedu	e F)
	instructions. Use a separate line for each.) *	7.2	idends (see instructions)	717000	Dividends	4. Interest	5. Gross R Royalties	and	6. Gross Income From Performance	7. Other (attach schedule)	8, Total (add columns 2(a) through 7)
_	each.) *	(a) Exclude gross-	up (b) Gross-up (sec. 78)	(a) Exclude gross-up	(b) Gross-up (sec. 78)		License F	ees	of Services		1 No. 1
A	AA	4						_		10,605	10,605
В	AE									13,193,619	13, 193, 619
C	AG		The second			2,031,349	1,20	4,554		83,548,609	86,784,712
D	AJ						2,07	7,431		6,952,774	9,030,205
E	AO .						96	1,845		24,964,353	25,926,198
F		19,561,0	9,423,406	22,991,379	21,485,239	49,261,566	113,93	6,579		1,203,469,294	1,440,128,504
ota	s (add lines A through F)	19,561,0	9,423,406	22,991,379	21,485,239	51,292,915	118,18	0,409		1,332,139,454	1,575,073,843
For	section 863(b) income, NO		and high-laxed income, use Deductions (IN Definitely Allocable Dedu	CLUDE Foreign B	ctions). ranch Deductions h		edule F)				13. Total Income or
	Rental, Royalty, and Lis		(c) Expenses Related to Gross	(d) Other	(e) Total Definitely	of Dedu	ctions Not.		Net Operating	12. Total Deductions (add	(Loss) Before Adjustments (subtraction) column 12 from
	(a) Depreciation, Depletion, and Amortization	(b) Other Expenses	Income From Performance of Services	Allocable Deductions	Deductions (add columns 9(a) through 9(d))	applicat Schedule	De line of H, Part II, nn (d))	Los	s Deduction	columns 9(e) through 11)	column 8)
Α							1,061			1,061	9,544
В				-221,12	3 -221,	123	6,698,133			6,477,010	6,716,609
C				29,139,65	0 29,139,	650 1	5,072,364			44,212,014	42,572,698
D						- 4	680,699			680,699	8,349,506
E						1	2,112,640			12,112,640	13,813,558
F				299,845,82	2 299,845,1	122 49	4,993,977			794,839,799	645,288,705
otato				328,764,34	9 328,764,3	349 52	9,558,874			858, 323, 223	716,750,620
_	Danarwark Baduatia	Act Notice co	separate instruction	ve.		7				mi	1118 (Rev. 12-2009

Exh 1 -008

	1. Credit is C	9-51-1		2. Foreign	Taxes Paid or Accrued (att	tach schedule showing	amounts in foreign curr	rency and conversion rate((s) used)		3. Tax Deemed Paid
П	for Taxe	X Accrued	Tax Withheld at	Source on:		Other Forei	gn Taxes Paid or Accru	ed on:		(h) Total Foreign Taxes	(from Schedule C- Part I, column 10
F	Date Paid	Date Accrued	(a) Dividends	(b) interest	(c) Rents, Royalties, and License Fees	(d) Section 883(b) Income	(e) Foreign Branch Income	(f) Services Income	(g) Other	Paid or Accrued (add columns 2(a) through 2(g))	Part II, column 8(b), and Part III, column 8
		VARIOUS									
		VARIOUS			757,919					757,919	
		VARIOUS			564,659				18,147,587	18,712,246	
1		VARIOUS									
		VARIOUS			2,745,640					2,745,640	
T		SEE STMT			84,274,240				102,796,390	187,070,630	30,908,645
tals	s (add lines A	through F)			88,342,458				120,943,977	209, 286, 435	30,908,645
	Taxes re-	classified under sum of any ca	er high-tax kickout arryover of foreig	n taxes (from Sc	r total from Schedule chedule K, line 3, colu	umn (xiv)) plus any	carrybacks to the	current tax year	13) 185,219 8,041,591	378, 421, 890
5 6 7 8 a	Taxes rec Enter the Total fore Enter the result fro Total tax	classified under sum of any categor taxes (con amount from m the "Totals" able income fro	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 om all sources (e	n taxes (from So ugh 5) lumn of Schedu 3 of the applicab nier taxable inco	chedule K, line 3, columbre 1, Part I, line 11 (some 15 Schedule A	umn (xiv)) plus any ee instructions). If	carrybacks to the	e current tax year required to be com	pleted, enter the	8,041,591	. Zo Tun (5)
5 6 7 8 a b	Taxes rec Enter the Total fore Enter the result fro Total taxa Adjustme	classified under sum of any caseign taxes (con amount from m the "Totals" able income frents to line 8a	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 om all sources (e (see instructions)	n taxes (from So ugh 5) lumn of Schedul 3 of the applicab nter taxable inco	chedule K, line 3, colu e J, Part I, line 11 (so le Schedule A	umn (xiv)) plus any ee instructions). If tion's tax return)	carrybacks to the	current tax year required to be com	pleted, enter the	3,922,339	1,170,675,353
abc	Taxes rec Enter the Total fore Enter the result fro Total taxe Adjustme Subtract	classified under sum of any case grant taxes (core amount from m the "Totals" able income frents to line 8a line 8b from line	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 om all sources (e (see instructions) ne 8a	n taxes (from Sc ugh 5)	chedule K, line 3, columber J, Part I, line 11 (so le J, Part I, line 11 (so le Schedule A	umn (xiv)) plus any ee instructions). If tion's tax return)	carrybacks to the	current tax year required to be com	pleted, enter the	3,922,339	1,170,675,353 1,673,922,339
abc	Taxes rec Enter the Total fore Enter the result fro Total taxe Adjustme Subtract Divide lin	classified under sum of any categor taxes (con amount from m the "Totals" able income from the to line 8a line 8b from line 8c.	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 om all sources (e (see instructions) ne 8a	n taxes (from So ugh 5) lumn of Schedu 3 of the applicab nter taxable inco	chedule K, line 3, columber J, Part I, line 11 (so le Schedule A	umn (xiv)) plus any ee instructions). If tion's tax return)	carrybacks to the Schedule J is not schedule J i	e current tax year	pleted, enter the	3,922,339	1,170,675,353 1,673,922,339 0.699361
3 a b c	Taxes red Enter the Total fore Enter the result fro Total taxa Adjustme Subtract Divide lin Total U.S	classified under sum of any case of any case (core amount from the "Totals" able income to a line 8a line 8b from line 8c. income tax a case of any come tax a	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 oom all sources ((see instructions) ne 8a Enter the resultin against which crea	n taxes (from So ugh 5) lumn of Schedu 3 of the applicab nter taxable inco ing fraction as a d dit is allowed (re	chedule K, line 3, columned to J, Part I, line 11 (so le Schedule A	umn (xiv)) plus any ee instructions). If stion's tax return) ions). If line 7 is g section 28(b)) m	carrybacks to the Schedule J is not sch	required to be com	pleted, enter the	3,922,339	1,170,675,353 1,673,922,339 0.699361 585,872,819
5 6 7 8 a b c	Taxes received the Total fore Enter the result fro Total taxe Adjustme Subtract Divide lin Total U.S Credit lim Separate	classified under sum of any case from taxes (core amount from m the "Totals" able income from line 8a line 8b from line 7 by line 8c. 5. income tax a nitation (multip foreign tax c	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 om all sources (e (see instructions) ne 8a	n taxes (from Sc ugh 5) dumn of Schedul 3 of the applicab nter taxable inco ng fraction as a of dit is allowed (re- to) (see instruction	e J, Part I, line 11 (see J, Part I, line 11 (see Schedule A	umn (xiv)) plus any ee instructions). If tition's tax return) ions). If line 7 is g section 28(b)) m	y carrybacks to the Schedule J is not reater than line 8c inus American Sa line of Part III)	e cument tax year required to be com ;, enter 1 amoa economic deve	pleted, enter the	3,922,339	1,170,675,353 1,673,922,339 0.699361 585,872,819 409,736,601 378,421,890
5 6 7 8 a b c 9 0 1 2	Taxes received the Total fore Enter the result fro Total taxe Adjustme Subtract Divide lin Total U.S Credit lim Separate III - Sum	classified under sum of any case amount from m the "Totals" able income from this line 8b from line 8b from line 8c. 5, income tax a ditation (multip foreign tax camary of September 1991).	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co-line of column 13 oom all sources (e (see instructions) ne 8a	n taxes (from Sough 5) John of Schedul To the applicabe Inter taxable income To fraction as a country To the applicabe To the applic	e J, Part I, line 11 (so le Schedule A	umn (xiv)) plus any ee instructions). If stion's tax return) ions). If line 7 is g section 26(b)) m the appropriate l 2 for each applic	y carrybacks to the Schedule J is not reater than line 8c inus American Sa line of Part III) cable category o	required to be com ;, enter 1 amoa economic deve	pleted, enter the	3,922,339	1,170,675,353 1,673,922,339 0.699361 585,872,819 409,736,601 378,421,890
5 6 7 8 8 8 6 0 1 2 2 art	Taxes recently the Total fore Enter the result from Total taxa. Adjustme Subtract Divide lin Total U.S. Credit III Separate III - Sum Credit for Credit fo	classified under sum of any caseign taxes (con amount from m the "Totals" able income from the 8a line 8b from line 8 or by line 8c. income tax anitation (multip foreign tax cumary of Septaxes on pasi	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co-line of column 15 om all sources (e (see instructions) ne 8a Enter the resulting against which credity line 9 by line 10 redit (enter the srarate Credits (E sive category inco	n taxes (from Sough 5)	e J, Part I, line 11 (so le Schedule A ome from the corpora decimal (see instructi gular tax liability (see ns). r line 11 here and on from Part II, line 12	ee instructions). If stion's tax return) ions). If line 7 is g section 28(b)) m the appropriate l 2 for each applic	y carrybacks to the Schedule J is not treater than line 8c linus American Sa line of Part III)	required to be com	pleted, enter the 1,67,	3,922,339 aid to sanctione	1,170,675,353 1,673,922,339 0.69936: 585,672,819 409,736,601 378,421,890
5 6 7 8 a b c 9 0 1 2 art	Taxes recently the Total fore Enter the result from Total taxa. Adjustme Subtract Divide lin Total U.S. Credit III Separate III - Sum Credit for Credit fo	classified under sum of any caseign taxes (con amount from m the "Totals" able income from the 8a line 8b from line 8 or by line 8c. income tax anitation (multip foreign tax cumary of Septaxes on pasi	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co-line of column 15 om all sources (e (see instructions) ne 8a Enter the resulting against which credity line 9 by line 10 redit (enter the srarate Credits (E sive category inco	n taxes (from Sough 5)	e J, Part I, line 11 (so le Schedule A ome from the corpora decimal (see instructi gular tax liability (see ns). r line 11 here and on from Part II, line 12	ee instructions). If stion's tax return) ions). If line 7 is g section 28(b)) m the appropriate l 2 for each applic	y carrybacks to the Schedule J is not treater than line 8c linus American Sa line of Part III)	required to be com	pleted, enter the 1,67,	3,922,339	1,170,675,353 1,673,922,339 0.699361 585,872,819 409,736,601 378,421,890
8 a b c 9 0 1 2 art 1 2 3	Taxes recently the control of the co	classified under sum of any case amount from the "Totals" able income from the 8c line	er high-tax kickout arryover of foreignible lines 1 thro the applicable to line of column 13 oom all sources (e (see instructions) ne 8a	n taxes (from Sough 5) Jumn of Schedul 3 of the applicable inter taxable incoming fraction as a dit is allowed (re- 1) (see instructionaller of line 6 of enter amounts me me y treaty (combine	chedule K, line 3, column to J, Part I, line 11 (some from the corporal decimal (see instructing a lar tax liability (see ns). Tilne 11 here and on from Part II, line 12	umn (xiv)) plus any ee instructions). If tion's tax return) ions). If line 7 is g section 26(b)) m the appropriate I 2 for each applic	y carrybacks to the Schedule J is not reater than line 8d inus American Sa line of Part III) cable category o	required to be com ;, enter 1 amos economic deve	pleted, enter the 1,67 elopment credit) include taxes p	3, 922, 339 aid to sanctione	
5 6 7 8 8 8 6 0 1 2 2 3 4	Taxes recently the control of the co	classified under sum of any caping taxes (core amount from m the "Totals" able income from the 8b income tax a nitation (multip foreign tax caping of per taxes on passible taxes on general sax of taxes on income taxes on income taxes on income taxes on income of the sax of taxes on income of taxes on income of the sax of taxes on income of taxes of taxes of taxes on income of taxes of	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 com all sources (e (see instructions) ne 8a	n taxes (from Sough 5) Jumn of Schedul 3 of the applicab Inter taxable inco Inter taxabl	chedule K, line 3, columned J, Part I, line 11 (some from the corporatecimal (see instructing all at tax liability (see ins). In the 11 here and on from Part II, line 12 and	ee instructions). If tition's tax return) ions). If line 7 is g section 28(b)) m the appropriate 12 for each application is line)	y carrybacks to the Schedule J is not greater than line 9c inus American Sa line of Part III)	e current tax year required to be com, enter 1 amos economic deve	pleted, enter the 1,67: elopment credit) . include taxes p	3, 922, 339 aid to sanctione 8, 421, 890	1,170,675,353 1,673,922,339 0,699361 585,872,819 409,736,601 378,421,890
5 6 6 7 8 a b c c c c c c c c c c c c c c c c c c	Taxes recently the control of the co	classified under sum of any caping taxes (con amount from m the "Totals" able income from the 8b income from the 8b income tax anitation (multip foreign tax camary of Sep taxes on passing taxes on income in credit for income and income anitaxes on income of the second taxes on income of tax	er high-tax kickout arryover of foreig mbine lines 1 thro the applicable co line of column 13 com all sources (e (see instructions) ne 8a Enter the resulting against which credit (enter the signarate Credits (I state Category incomer category incomer er-sourced by gn 3) International boyonthere in the signarate column in the signara	n taxes (from Sough 5) Jumn of Schedul 3 of the applicab Inter taxable inco Inter amounts Inter taxable inco Inter amounts Inter taxable inco Int	e J, Part I, line 11 (so le Schedule A ome from the corpora decimal (see instructi gular tax liability (see ns). r line 11 here and on from Part II, line 12	umn (xiv)) plus any ee instructions). If stion's tax return) ions). If line 7 is g section 26(b)) m the appropriate l 2 for each applic	y carrybacks to the Schedule J is not greater than line 9c inus American Sa line of Part III) cable category c	e current tax year required to be com enter 1 amos economic deve	pleted, enter the 1,67: elopment credit) . include taxes p	3, 922, 339 aid to sanctione 8, 421, 890	1,170,675,3: 1,673,922,3: 0.6993 585,872,8 409,736,6: 378,421,8 d countries.

Form 1118 (Rev. 12-2009)

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Form 1118 (Rev. 12-2009) Page 3 Tax Deemed Paid by Domestic Corporation Filing Return

Use this schedule to figure the tax deemed paid by the corporation with respect to dividends from a first-tier foreign corporation under section 902(a), and deemed inclusions of earnings from a first- or lower-tier foreign corporation under section 960(a). Report all amounts in U.S. dollars unless otherwise specified. Schedule C Part I-Dividends and Deemed Inclusions From Post-1986 Undistributed Earnings Foreign Taxes Paid and Dee Paid for Tax Year Indicated 7. Post-1966 3. Country of 5. Opening Balance in 8. Dividends and 9. Divide Column 8(a) by Column 4 10. Tax Deemed Paid (multiply column 7 by column 9) 1. Name of Foreign 2. Tax Year End Foreign Corporation (identify DISCs and former DISCs) (b) Taxes Deemed Paid (from Schedule D, Part I see instructions) Earnings (in (Yr-Mo) (see Post-1986 Income Taxes functional instructions) code from oreign Incom (a) Taxes Paid (add columns 5 (a) Functional Currency (b) U.S. Dollars Instructions) 6(a), and 6(b)) schedule) 05177 2010-12 CJ 462,804,255146,564,815 34,450,198 181,015,013 8,356,779 8,356,779 0.018057 3,258,558 1376T 2010-12 SN 221,239,839 35, 478, 476 8,075,636 43,554,112 7,431,269 7,431,269 .033589 1,462,948 2501T 2008-12 CJ-*PTI 2,343 2,343 2,343 1.000 2009-11 2501T CJ-*PTI 18,165 1.000 18,165 18,165 2569T 2010-12 UK 524,460,994 71,495,602 71,495,602 4,355,630 4,355,630 008305 593,768 2570T 2010-12 CJ -2,918,499 15,692 16,560 32,252 1,304 1,304 0.000 2584T 2010-12 NI 37,247,399 12,125,560 2,528,883 14,654,443 2,149,560 2,149,560 0.057710 845,713 24,737,658 30,908,645 Part II-Dividends Paid Out of Pre-1987 Accumulated Profits 5. Foreign Taxes Paid and Deemed Paid on Earnings and Profits (E&P) for Tax Year Indicated (in functional currency) (see instructions) 4. Accumulated Profits 8. Tax Deemed Paid 1. Name of Foreign 6. Dividends Paid 7. Divide Column 6(a) by Column 4 3. Country of for Tax Year Indicated (in functional currency 2. Tax Year End (see instructions) Corporation (identify DISCs and former DISCs) Incorporation (enter country code from instructions) (Yr-Mo) (see computed under (a) Functional Currency (b) U.S Dollars (b) U.S. Dollars (a) Functional Currency section 902) (attach schedule) 6643T 1987-12 CA 309.386 309.386 309.386 1,0000 Total (Add amounts in column 8b. Enter the result here and include on "Totals" line of Schedule B, Part I, column 3.) Part III - Deemed Inclusions From Pre-1987 Earnings and Profits 4. E&P for Tax Year Indicate 1. Name of Foreign Corporation (Identify 5. Foreign Taxes Paid and Deemed Paid for 6. Deemed Inclusions 7. Divide Column 6(a) by Column 4 3. Country of neorporation (ente Tax Year End fin functional currency translated from U.S. dollars, 8. Tax Deemed Paid (Yr-Mo) (see Instructions) (multiply column 5 by column 7) DISCs and fo Tax Year Indicated (see Instructions) country code from instructions) (a) Functional Currency (b) U.S. Dollars Total (Add amounts in column 8. Enter the result here and include on "Totals" line of Schedule B, Part I, column 3.) Form 1118 (Rev. 12-2009)

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Schedule D Tax Deemed Pa Use Part I to comp compute the tax of dollars unless other	oute the tax de eemed paid by	emed paid by a	first-tier foreign	corporat	ion with	respect to	divide	nds fro third-t	m a second ier foreign o	tier foreig corporation	corpo Repo	oration. rt all am	Use Part counts in	II to U.S.
Part I - Tax Deemed Paid by Fir.		n Corporations												
			86 Undistributed	Earning	s (Includ	de the colum	n 10 r	esults i	Schedule	C. Part I. co	lumn 6	(b).)		
Name of Second-Tier Foreign Corporation and its Related	2. Tax Year End (Yr-Mo) (see	3. Country of incorporation (enter country code from	4. Post-1986 Undistributed Earnings (in functional	5. Ope Balan Post-1986	ining ce in	6. Foreign Texes Paid for Tax	Paid and Year Indi	Deemed cated	7. Post-1986 Foreign Income Taxes (add	8. Dividend	s Pald (in I urrency)	unctional	9. Divide Column 6(a) by	10. Tax Deeme Paid (multiply column 7 by
First-Tier Foreign Corporation	instructions)	instructions)	currency-attach schedule)	Income		(a) Taxes Paid	Deem (see ins	Taxes sed Paid structions)	columns 5, 6(a), and 6(b))	(a) of Second Corporation		of First-tier orporation	Column 4	column 9)
2555T/2777T	2010-12	GM	36,371,756	7,53	2,383	7,989,074			15,521,457	16, 673, 10	9 16,	573,109	458408	7,114,76
2569T/6643T	2010-12	UK	524, 633, 515	63,77	7,840	7,741,280			71,519,120	172,52	1	172,521	,000329	23,51
2674T/6643T	2010-12	UK	74,415,496	4,85	1,806	749,959			5,601,765	1,608,87	4 1,	508,874	,021620	121,11
3144T/6643T	2005-12	UK-*PTI*	6,792,043							32,60	1	32,661	.004809	
SEE STATEMENT	11 11 11 11													
Section B - Dividends Paid Out of	Pre-1987 Accu	mulated Profits	Include the colu	mn 8(b) r	esults i	n Schedule C	, Part	I, colum	n 6(b).)					
1. Name of Second-Tier Foreign	2. Tax Year	3. Country of	4. Accumulated			n Taxes Pald and O		6. Civider	nds Pald (in functio	onal currency)	7. Divid		ax Deemed Pa	id (see instructions)
Corporation and its Related First-Tier Foreign Corporation	End (Yr-Mo) (see instructions)	incorporation (enter country code from instructions)	Tax Year Ind (in functional c attach sche	urrency -	fu	or Tax Year Indicates national currency - see instructions)	d (in	(a) of Se		of First-tier	G(a) by Column	of	Functional Currency Second-tier orporation	(b) U.S. Dollars
Part II - Tax Deemed Paid by Se Section A - Dividends Paid Out of 1. Name of Third-Tier Foreign Corporation and its Related Second-Tier Foreign Corporation				5, Ope Baland Post-1986 Income	ning e in Foreign	s in Section / 6. Foreign Taxes Paid for Tax (a) Taxes Paid	Paid and	Deemed), of Part I at 7. Post-1986 Foreign Income Taxes (add columns 5, 8(a), and 6(b))	8. Dividend	irrency) er (b) of	unctional Second-tier orporation	9. Divide Column 8(a) by Column 4	10. Tax Deeme Paid (multiply column 7 by column 9)
	Pro-1987 Acetu		-		_		-					1		
Section B - Dividends Paid Out of			4. Accumulated			Taxes Paid and De Tax Year Indicated	(in		ds Paid (in function	Second-tier	7. Divide Column 6(a) by	(a) In	Experied Pai Functional urrency Third-tier reporation	(b) U.S. Dollars
Section B - Dividends Paid Out of 1. Name of Third-Tier Foreign Corporation and its Related Second-Tier Foreign Corporation	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	Tax Year Indi	итепсу -		tional currency - ser instructions)	•	Corps		orporation	Column 4	Co	rporation	
Corporation and its Related	2. Tax Year End (Yr-Mo) (see	Incorporation (enter country code from	Tax Year Indi	итепсу -		tional currency - see	•				Column 4	Co	rporation	
Name of Third-Tier Foreign Corporation and its Related	2. Tax Year End (Yr-Mo) (see	Incorporation (enter country code from	Tax Year Indi	итепсу -		tional currency - see					Column 4	. Co	rporation	

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Part I - Tax Deemed Paid by Thir		n Corporation									
1. Name of Fourth-Tier Foreign	2. Tax Year End	3. Country of incorporation (enter	4. Post-1986 Undistributed Earnings	5. Opening Balance in		Paid and Deemed Year Indicated	Foreign Income		ids Paid (in I currency)	9. Divide Column	10. Tax Deeme Paid (multiply
Corporation and its Related Third-Tier Foreign Corporation	(Yr-Mo) (see (natructions)	country code from instructions)	(in functional currency - attach schedule)	Post-1986 Foreign Income Taxes	(a) Taxes Paid	(b) Tases Desmed Paid (from Part II, column 10)	Taxes (add columns 5, 6(a), and 6(b))	1-010-01-01-01-01-01-01-01-01-01-01-01-0	(b) Of Third-lier CFC	B(a) by Column 4	column 7 by column 9)
			-								
Part II - Tax Deemed Paid by Fou	rth-Tier Fore	eign Corporati	ons (Include the	e column 10 r	results in colu	umn 6(b) of	Part I above	e.)			
1. Name of Fifth-Tier Foreign	2. Tax Year End	3. Country of Incorporation (enter	4. Post-1986 Undistributed Earnings	5. Opening Balance in	6. Foreign Taxes	Paid and Deemed Year Indicated	7. Post-1988 Foreign Income		ds Paid (in I currency)	9. Divide Column	10. Tax Deeme Paid (multiply
Corporation and its Related Fourth-Tier Foreign Corporation	(Yr-Mo) (see instructions)	country code from instructions)	(in functional surrency - attach schedule)	Post-1986 Foreign Income Taxes	(a) Taxes Paid	(b) Taxes Derrord Paid (from Parl III, column 10)	Taxes (add columns 5, 6(a), and 6(b))	(a) Of Fifth-Ser CFC	(b) Of Fourth-tier CFC	8(a) by Column 4	column 7 by column 9)
Part III - Tax Deemed Paid by Fift	h-Tier Forei	gn Corporation	ns (Include the	column 10 re	sults in colun	nn 6(b) of P	art II above	.)			
1. Name of Sixth-Tier Foreign	2. Tax Year End	3. Country of Incorporation (enter	4. Post-1986 Undistributed Earnings	5, Opening Balance in	6. Forei	gn Taxes	7. Post-1986 Foreign Income	8. Dividen		9. Divide Column	10. Tax Deemed
Corporation and its Related Fifth-Tier Foreign Corporation	(Yr-Mo) (see instructions)	country code from instructions)	(in functional currency - attach achedule)	Post-1956 Foreign Income Taxes		Tax Year caled	Taxes (add columns 5 and 6)	(a) Of Sixth-tier OFC	(b) Of Fifth-tier CFC	B(a) by Column 4	column 7 by column 9)
					-						

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Sch	Gross Income and Branches	Definitely Allocable De	ductions for Foreign	Sch	edule G Reductions of Taxes Paid, Accrued, or De	eemed Paid
1. For two-le	reign Country or U.S. Possession (Enter etter code from Schedule A, column 1, Use a separate line for each.)	2. Gross-Income	Definitely Allocable Deductions	A	Reduction of Taxes Under Section 901(e) - Attach separate schedule	0
A	oc	1,607,357,806	328,764,349	В	Reduction of Foreign Oil and Gas Taxes - Enter amount from Schedule I, Part II, line 6	o
В				С	Reduction of Taxes Due to International Boycott Provisions - Enter appropriate portion of Schedule C (Form 5713), Jine 2b. Important: Enter only "specifically attributable taxes" here.	0
C				D	Reduction of Taxes for Section 6038(c) Penalty - Attach separate schedule	a
D				E	Other Reductions of Taxes - Attach schedule(s)	0
E				-		
F					and the second second second	
Total	Is (add lines A through F)*	1,607,357,806	328,764,349		II (add lines A through E). Enter here and on Schedule art II, line 3.	

Note: The Schedule F totals are not partied over to any other Form 1118 Schedule. (These totals were already included in Schedule A.) He were, the IRS requires the corporation to complete Schedule F under the authority of section 905(b). Form 1 118 (Rev. 12-2009)

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Form 1118 (Rev. 12-2009)

Schedule H Apportionment of Deductions Not Definitely Allocable (complete only once)

Part I - Research and Development Deductions

(a) Sales Method (b) Gross Income Method-Check method used:

		/ to		(a) Sales Method			(b) Gross Income Meth	od-Check method used:	LAT-LA DED
		Product line #1 (S	IC Code;138)*	Product line #2 (SIC	Code:)	(v) Total R&D	Option 1	Option 2 instructions.)	(c) Total R&D Deductions Not
		(i) Gross Sales	(II) R&D Deductions	(III) Gross Sales	(iv) R&D Deductions	Deductions Under Sales Method (add columns (ii) and (iv)	(vi) Gross Income	(vii) Total R&D Deductions Under Gross Income Method	Definitely Allocable (enter all amounts from column (a)(v)
1	Totals (see instructions)	38,504,323,123	255,783,706		94,632,552	350,416,258	0		or all amounts from column (b)(vii))
2	Total to be apportioned		127,891,853		47,316,276	175,208,129			
3	Apportionment among statutory groupings:								
а	General category income	2,798,519,419	9,295,264		29,235,412	38,530,675			38,530,675
b	Passive category income	-		0					
c	Section 901(j) income*		0						
d	Income re-sourced by treaty*								
4	Total foreign (add lines 3a through 3d)	2,798,519,419	9,295,254		29,235,412	38,530,675			38,530,675

* Important: See Computer-Generated Schedule H in Instructions.

Form 1118 (Rev 12-2009)

JSA 0C2251 1.000

Part II - Interest Deductions, All Other Deductions, and Total I	(a) Average Value of Ass	ate. Chark mathed year!			T	
	Fair market value	(b) Interest C	Deductions	(c) All Other Deductions Not Definitely Allocable	(d) Totals (add the corresponding	
	(I) Nonfinancial Corporations	(ii) Financial Corporations	(iii) Nonfinancial Corporations	(iv) Financial Corporations		amounts from column (c), Part I;
1 a Totals (see instructions)	17,312,464,155		447,750,940		338, 973, 927	(b)(iv), Part II; and column (c), Part II).
 Amounts specifically allocable under Temp. Regs. 1.861-10T(e) 						Enter each amount from lines 3a through 3d below
c Other specific allocations under Temp. Regs. 1.861-10T			140,440,815			in column 10 of the corresponding Schedule A.
d Assets excluded from apportionment formula						Schedule A.
2 Total to be apportioned (subtract the sum of lines 1b, 1c, and 1d from line 1a)	17,312,464,155		307,310,125			
3 Apportionment among statutory groupings:					200	
a General category income	8,566,050,769		152,054,272		338,973,927	529,558,874
b Passive category income	226,103,426		4,013,517			4,013,517
c Section 901(j) income*	2,510,669		44,566			44,566
d Income re-sourced by treaty*						
4 Total foreign (add lines 3a through 3d)	8,794,664,864		156,112,355		338,973,927	533, 616, 957

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Case 4:24-cv-02149 Document 30 ASPAINMENDELL 1/21/24 in TXSD Page 16 of 35

Schedule J (Form 1118)

(Rev. January 2009)

Adjustments to Separate Limitation Income (Loss) Categories for Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances, and Overall Foreign and Domestic Loss Account Balances

For calendar year_	2010,	or other tax year	ar beginning	7
		- H		

and ending _ Attach to Form 1118. For Paperwork Reduction Act Notice, see the Instructions for Form 1118.

Department of the Treasury Internal Revenue Service Employer identification number Name of corporation

_	Fractions (see instructions)				
		(i) General category income	(ii) Passive category income	(iii) Other income*	(iv) U.S. income
1	Income or (loss) before adjustments	716,750,620	-2,914,080	-44,566	960,130,365
2	Allocation of separate limitation losses:				
a	General category income		()(
b	Passive category income	(2,914,080	2,914,080 ()	
C	Other income*	(44,566)		44,566	
3	Subtotal - Combine lines 1 through 2c.	713,791,974			960,130,365
4	Allocation of overall foreign losses			(
5	Allocation of domestic losses	(()()	
6	Subtotal - Combine lines 3 through 5.	713,791,974			960,130,365
7	Recapture of overall foreign losses	(()()	
8	Subtotal - Combine lines 6 and 7.	713,791,974			960,130,365
9	Recharacterization of separate limitation income:				,,
a	General category income	l(
	Passive category income		(
	Other income*		10	7	
10	Recapture of overall domestic				
	losses	456,883,379	98,862		-456, 982, 241
11	Numerator of Limitation Fraction -	430,003,379	30,002		-430,302,241
	Combine lines 8 through 10. Enter each				
	result here and on Schedule B, Part II, line				
	7, of corresponding Form 1118.	1 170 675 252	00.000		
	till Year-End Balances of Future Separ	1,170,675,353	98,862	paraetorized (secti	on 904(f)(5)(C))
	General category income	ate Limitation incom	e mat wust be Reci	iai acterized (Section	011 904(1)(0)(0))
	Passive category income	2 014 000			
	Other income*	2,914,080	2 224		
	t III Overall Foreign Loss Account Bala	364,351	2,804		
Par			9)		
4	Complete for each separate limitation	in income category.	1		
1	Beginning balance				
2	Current year additions	1			
3	Current year reductions (other than	,			
	recapture)		1)	
4	Current year recapture (from Part I, line 7)	()			
5	Ending balance - Combine lines 1 through 4.			- 1	
Par	IV Overall Domestic Loss Account Ba	lances (section 904(c)(1))		
1	Beginning balance	648,569,233	140,340		
2	Current year additions				
3	Current year reductions (other than				
9	recapture)	(()(1	
4	Subtotal - Combine lines 1 through 3.	648,569,233	140,340	-	
	Current year recapture (from Part I, line	04010031233	210,010		
	10)	456,883,379	98,862		
6	Ending balance - Subtract line 5	430,003,379	30,002		
	Energy selector - Cubit dut inte o				

^{*} Important: See Computer-Generated Schedule J in instructions.

Schedule J (Form 1118) (Rev. 1-2009)

OMB No. 1545-0122

SCHEDULE K (Form 1118)	Fore	ign Tax Carry	over Recond	iliation Sche	dule		
2.20	r calendar year 20 10	, or other tax year I	beginning	20 and endi	ng 20		OMB No. 1545-0122
	Contribution your 20		See separate instruct		9		OND 140. 1343-0122
Department of the Treasury Internal Revenue Service			Attach to Form 111				
Name of corporation							Employer Identification Number
HALLIBURTON COMPANY							
Use a separate Schedule K (Form 1118) Passive Calegory Income General Category Income	Section 901	income listed below. (j) Income: Name of sourced by Treaty: N	Sanctioned Country	>			
Foreign Tax Carryover Reconcillation	(I) 10th Preceding Tax Year	(II) 9th Preceding Tax Year	(iii) 8th Preceding Tax Year	(iv) 7th Preceding Tax Year	(v) 8th Preceding Tax Year	(vi) 5th Preceding Tax Year	(vii) Subtotal (add columns (i) through (vi))
Foreign tax carryover from the prior tax year (enter the amount from line 6 of the worksheet in the instructions)							
2 Adjustments to line 1 (enter description - see instructions):							
a Carryback adjustment (see instructions)							
b Adjustments for section 905(c) redeterminations (see instructions)							
c							
d							
e							
f							
3 Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2).		4 1					
Foreign tax carryover utilized in current tax year (enter as a negative number)							
Foreign tax carryover expired unused in current tax year (enter as a negative number)							
Foreign tax carryover generated in current tax year							
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
Foreign tax carryover to the following tax year. Combine lines 3 through 7.	-0-						

For Paperwork Reduction Act Notice, see the instructions for Form 1118.

Schedule K (Form 1118) (12-2009)

JSA 0C2257 1,000

	Foreign Tax Carryover Reconciliation (continued)	(vill) Subtotal from page 1 (enter the amounts from column (vii) on page 1)	(ix) 4th Preceding Tax Year	(x) 3rd Preceding Tax Year	(xi) 2nd Preceding Tax Year	(xll) 1st Preceding Tax Year	(xili) Current Tax Year	(xiv) Totals (add columns (viii) through (xiii)
1	Foreign tax carryover from the prior tax year (enter the amount from line 6 of the worksheet in the instructions)					138,041,591		138,041,591
2	Adjustments to line 1 (enter description - see instructions):							
а	Carryback adjustment (see instructions)							
b	Adjustments for section 905(c) redeterminations (see instructions)							
C	0							
d								
e								
f								
g								
3	Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2). Enter the column (xiv) total on the current year Form 1118, Schedule B, Part II, line 5.					138,041,591		138,041,591
4	Foreign tax carryover utilized in current tax year (enter as a negative number)					-138,041,591		-138,041,591
5	Foreign tax carryover expired unused In current tax year (enter as a negative number)							
6	Foreign tax carryover generated in current tax year							
7	Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
8	Foreign tax carryover to the following tax year. Combine lines 3 through 7.							

Schedule K (Form 1118) (12-2009)

JSA 0C2258 1.000

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GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

AS AMENDED

Foreign Tax Credit - Corporations

(Re	v. December 2009)									OMB No. 1545-0122		
	artment of the Treasury	-			to the corporatio	n's t	The same of the same		_			
_	nal Revenue Service		For calendar year 2010	, or other tax year	beginning	_	, and end	ding		1	Paratara la atenata	densely du
	ie of corporation										Employer Identification	number
_	HALLIBURTON COMPANY											
	e a separate Form 111 eck only one box on ea	ch form.						of instruct	ions. Als	o, see Specific In	istructions.	
	Passive Category Inc	ome	Section 90	11(j) Income: Name	of Sanctioned Cou	untry	-					
x	General Category Inc	come	Income Re	e-sourced by Treaty	: Name of Country	_						
Sc	hedule A Income	or (Loss) Be	fore Adjustment	s (Report all am	ounts in U.S. do	llars	. See Spe	cific Instr	uction	5.)		
	Foreign Country or U.S. Possession (Enter		Gross income or (Lo	oss) From Sources	Outside the United	d Sta	tes (INCLUDE	Foreign I	Branch	Gross Income he	re <i>and</i> on Schedul	e F)
	two-letter code; see instructions. Use a separate line for each.) *	The state of the s	dends (see instructions)	3. Other I		-	. Interest	5. Gross F Royalties	, and	6. Gross Income From Performance	7. Other (attach schedule)	a. Total (add columns 2(a) through 7)
		(a) Exclude gross-	(b) Gross-up (sec. 78)	(a) Exclude gross-up	(b) Gross-up (sec. 78)	(License	Fees	of Services		117.23.131
A	AA										10,605	10,605
В	AE										13,193,619	13,193,619
C	AG				9		2,031,349	1,20	4,554		83,548,809	86,784,712
D	AJ							2,07	7,431		6,952,774	9,030,205
E	AO							96	1,845		24,964,353	25, 926, 198
F		19,561,04	1 9,423,406	22,991,379	21,485,239	4	9,261,566	113,93	6,579		1,203,469,294	1,440,128,504
ota	ls (add lines A through F)	19,561,04	1 9,423,406	22,991,379	21,485,239		1,292,915	118,18	0,409		1,332,139,454	1,575,073,843
For	section 863(b) income, NOL	s, income from RICs,	and high-taxed income, use	a single line (see instruc	tions).			7 6 6				
			Deductions (IN	CLUDE Foreign Br.	anch Deductions h	ere a	nd on Sched	ule F)				N
		9.	Definitely Allocable Dedu	ctions			10, Apportion	ed Share				13. Total Income or (Loss) Before
	Rental, Royalty, and Lic	ensing Expenses	(c) Expenses	(d) Other	(e) Total Definitely	y	of Deduction Definitely Al	ns Not locable	20%	in the same	12. Total	Adjustments (subtract
	(a) Depreciation, Depletion, and Amortization	(b) Other Expenses	Related to Gross Income From Performance of Services	Definitely Allocable Deductions	Allocable Deductions (add columns 9(a) through 9(d))		spplicable Schedule H, column	line of Part II,		let Operating s Deduction	Deductions (add columns 9(e) through 11)	column 12 from column 8)
A								1,061			1,061	9,544
В				-221,123	-221,	123	6,	698,133			6,477,010	6,716,609
B				29,139,650	29,139,	650	15,	072,364			44,212,014	42,572,698
D								680,699			680,699	8,349,506
E							12,	112,640			12,112,640	13,813,558
F				299,845,822	299,845,8	822		993,977			794,839,799	645,288,705
otais				328,764,349	328,764,3	349	529.	558,874			858, 323, 223	716,750,620

JSA 0W99CA 1.000

Form 1118

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

for	is Claimed		2. Foreign	Taxes Paid or Accrued (att	ach schedule showing	amounts in foreign cum	rency and conversion rate(s) used)		3. Tax Deemed Paid
	Taxes:	Tax Withheld at	Source on:		Other Forei	gn Taxes Paid or Accru	ed on:		(h) Total Foreign Taxes	(from Schedule C -
Date Pa		(a) Dividends	(b) Interest	(c) Rents, Royalties, and License Feas	(d) Section 863(b) Income	(e) Foreign Branch Income	(f) Services Income	(g) Other	Paid or Accrued (add columns 2(a) through 2(g))	Part II, column 10, Part II, column 8(b), and Part III, column 8)
Date	VARIOUS									
	VARIOUS		-	757,919					757,919	
	VARIOUS			564,659				18,147,587	18,712,246	
	VARIOUS									
	VARIOUS			2,745,640					2,745,640	
1	SEE STMT			84,274,240			P	102,796,390	187,070,630	30,908,645
ls (add lin	es A through F)			88,342,458				120,943,977	209, 286, 435	30,908,645
Enter				le J, Part I, line 11 (se le Schedule A		Schedule J is not	required to be com			
result Total	laxable income fro		nter taxable inco	ome from the corpora	tion's tax return)	والمتارين		1,69		1,183,335,275
result Total Adjus	laxable income fro Iments to line 8a	(see instructions)	nter taxable inco	ome from the corpora	tion's tax return)			1,69	9,247,661	
result Total Adjus Subtra	laxable income fro lments to line 8a act line 8b from lir	(see instructions) ne 8a	nter taxable inco	ome from the corpora	tion's tax return)			1,69	9,247,661	1,699,247,661
result Total Adjust Subtra Divide	laxable income fro Iments to line 8a act line 8b from lir I line 7 by line 8c.	(see instructions) ne 8a Enter the resultir	nter taxable inco	ome from the corpora	tion's tax return) ons). If line 7 is g	reater than line 8c	; enter 1	1,69	9,247,661	1,699,247,661 0.696388
result Total Adjus Subtra Divide	taxable income from tments to line 8a of act line 8b from lin line 7 by line 8c, U.S. income tax a	(see instructions) ne Ba, Enter the resultingainst which cree	nter taxable inco ng fraction as a dit is allowed (re	ome from the corpora decimal (see instruction gular tax liability (see	tion's tax return) ons). If line 7 is g section 26(b)) m	reater than line 8c inus American Sa	;, enter 1	2,69	9,247,661	1,699,247,661 0.696388 339,849,532
result Total Adjust Subtra Divide Total Credit	taxable income fro tments to line 8a d act line 8b from lin line 7 by line 8c, U.S. income tax a t limitation (multipl	(see instructions) ne 8a Enter the resultir gainst which cred by line 9 by line 10	nter taxable inco ng fraction as a dit is allowed (re 0) (see instruction	ome from the corpora decimal (see instruction gular tax liability (see ons).	tion's tax return) ons). If line 7 is g section 26(b)) m	reater than line 8c inus American Sa	, enler 1	2,69	9,247,661	1,699,247,661 0.696388 339,849,532 236,667,136
result Total Adjust Subtra Divide Total Credit	laxable income from the timents to line 8a lact line 8b from line line 7 by line 8c, U.S. income tax at limitation (multiple ate foreign tax co	(see instructions) ne 8a Enter the resultir gainst which cred ly line 9 by line 10 redit (enter the si	nter taxable income ng fraction as a dit is allowed (re 0) (see instructionaller of line 6 o	ome from the corpora decimal (see instruction gular tax liability (see	tion's tax return) ons). If line 7 is g section 26(b)) m	reater than line 8c inus American Sa ine of Part III)	;, enter 1 amoa economic deve	elopment credit)	9,247,661	1,699,247,661 0.596388 339,849,532 236,667,136 236,667,136
result Total Adjust Subtra Divide Total Credit Separ t III - S	taxable income for timents to line 8a act line 8b from lir line 7 by line 8c. U.S. income tax a limitation (multa) ate foreign tax co ummary of Sep	(see instructions) te 8a	nter taxable income inc	ome from the corpora decimal (see instructi gular tax liability (see ons). In line 11 here and on from Part II, line 12	tion's tax return) ons). If line 7 is g section 26(b)) m the appropriate I	reater than line Bo inus American Sa ine of Part III) able category c	; enter 1 amoa economic deve of income. Do not	elopment credit) .	9,247,661	1,699,247,661 0.596388 339,849,532 236,667,136 236,667,136
result Total Adjust Subtra Divide Total Credit Separ t III - S	taxable income for timents to line 8a act line 8b from lir line 7 by line 8c. U.S. income tax a limitation (multa) ate foreign tax co ummary of Sep	(see instructions) te 8a	nter taxable income inc	ome from the corpora decimal (see instructi gular tax liability (see ons). In line 11 here and on from Part II, line 12	tion's tax return) ons). If line 7 is g section 26(b)) m the appropriate I	reater than line Bo inus American Sa ine of Part III) able category c	; enter 1 amoa economic deve of income. Do not	elopment credit) .	9,247,661	1,699,247,661 0.596388 339,849,532 236,667,136 236,667,136
result Total Adjus Subtra Divide Total Credit Separ t III - S Credit Credit Credit	taxable income for timents to line 8a act line 8b from lin I line 7 by line 8c. U.S. income tax a I limitation (multipli ate foreign tax co ummary of Sep for taxes on pass for taxes on income	(see instructions) ne Ba	nter taxable incoming fraction as a still is allowed (re 0)) (see instruction maller of line 6 of Enter amounts me street (combine)	decimal (see instructi gular tax liability (see ons). In line 11 here and on from Part II, line 12	tion's tax return) ons), if line 7 is g section 26(b)) m the appropriate I for each applic	reater than line 8c inus American Sa ine of Part III) able category c	; enter 1 moa economic deve fincome. Do not	elopment credit) . include taxes p	aid to sanctione	1,699,247,661 0.596388 339,849,532 236,667,136 236,667,136
result Total Adjus Subtra Divide Total Credit Separ t III - S Credit Credit Credit Credit Total Credit	taxable income for timents to line 8a act line 8b from line 1 line 7 by line 8c. U.S. income tax a limitation (multiple ate foreign tax commary of Septor taxes on gene for taxes on gene add lines 1 through	(see instructions) ne 8a	nter taxable incoming fraction as a dit is allowed (re o) (see instruction maller of line 6 of enter amounts me me y treaty (combin	decimal (see instructi gular tax liability (see ins), r line 11 here and on from Part II, line 12	tion's tax return) ons). If line 7 is g section 26(b)) m the appropriate I for each applic	reater than line 8c inus American Sa ine of Part III) cable category c	; enter 1 amoa economic devo fincome. Do not	elopment credit) . include taxes p	aid to sanctione	1,699,247,661 0.596388 339,849,532 236,667,136 236,667,136
result Total Adjus Subtra Divide Total Credit Separ t III - S Credit Credit Credit Credit Total Credit	taxable income for timents to line 8a act line 8b from line 1 line 7 by line 8c. U.S. income tax a limitation (multiple ate foreign tax commary of Septor taxes on gene for taxes on gene add lines 1 through	(see instructions) ne 8a	nter taxable incoming fraction as a dit is allowed (re o) (see instruction maller of line 6 of enter amounts me me y treaty (combin	ome from the corpora decimal (see instructi gular tax liability (see ons). In line 11 here and on from Part II, line 12	tion's tax return) ons). If line 7 is g section 26(b)) m the appropriate I for each applic	reater than line 8c inus American Sa ine of Part III) cable category c	; enter 1 amoa economic devo fincome. Do not	elopment credit) . include taxes p	aid to sanctione	1,699,247,661 0.596388 339,849,532 236,667,136 236,667,136 d countries.)

Form 1118 (Rev. 12-2009)

JSA 0W99CB 1.000

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

1. Name of Foreign	2. Tax Year End	J. Country of Incorparation	4. Post-1986 Undistributed	5. Opening Balance in	6. Foreign Taxes Paid for Tax	Paid and De Year Indicate	ted	7. Post-198 Foreign	6	8. Divide		9. Divide	10. Tax Deemed Pai
Corporation (identify DISCs and former DISCs)	(Yr-Me) (see instructions)	(enter country cade from instructions)	Earnings (in functional currency - attach schedule)	Post-1986 Foreign Income Taxes	(a) Taxes Paid	(b) Taxes Paid (i Schedule (i see instr.	(from D, Part I -	(edd columns 6(a), and 6(t	5, (a) Function	(a) Functional Currency		by Column	
0517T	2010-12	CJ	462,804,255	146,564,815	34,450,198			181,015,01	3 8,	356,779	8,356,7	79 0.018057	3,268,558
1376T	2010-12	SN	221, 239, 839	35,478,476	8,075,636			43,554,11	2 7,	431,269	7,431,2	69 0.033589	1,462,948
2501T	2008-12	CJ-*FTI*	2,343					12123		2,343	2,3	43 1.000	1.000
2501T	2009-11	CJ-*PTI*	18,165							18,165	18,1	65 1.000	
2569T	2010-12	Oκ	524,460,994	71,495,602				71,495,60	2 4,	355,630	4,355,6	30 0.008305	593,768
2570T	2010-12	CJ	-2,918,499	15,692	16,560			32,2	-	1,304	1,3	_	
2584T	2010-12	NI	37,247,399	12,125,560	2,528,883			14,654,44	3 2.	149,560	2,149,5	0 0.057710	845,713
VII A													24,737,658 30,908,645
Paed (ABividends R	aid@ut tof.R	helel987 A		Products on "To	otals" line of Sch		Part I, co	olumn 3.)	.,,,,,	,,,,,			
1. Name of Foreign Corporation (Identify	2. Tax Year End (Yr-Mo) (see	3. Cour Incorporat	ntry of for 1	Fax Year Indicated unctional currency	and Deemed Paid Earnings and Profi (E&P) for Tax Yea	on ts		6. Dividends F	aid	7. Divi		8. Tax Deen (see instru	
DISCs and former DISCs)	instructions)	country of Instruc		amputed under stion 902) (attach schedule)	(in functional current (see instructions)	(a)	Functional I	Currency	b) U.S. Dollars		1.4 (a) Fun	tional Currency	(b) U.S. Dollars
6643T	1987-12	CA		309,386			309	9,386	309,386	1.0	000		
otal (Add amounts in					itals" line of Scho	edule B, F	Part I, co	lumn 3.)			ودووروني		
1. Name of For	eign	2. Tax Ye	er End	3. Country of proporation (enter	4. E&P for Tex Year Inc (in functional current	ocy		Taxes Paid	6,	Deemed In	dusions	7. Divide Column 6(a)	8. Tax Deemed Peki
DISCs and for DISCs)		(Yr-Mo) instruct	ions) cor	untry cade from Instructions)	translated from U.S. di computed under section (attach schedule)	n 984) T	Tax Year in	ndicated (see actions)	(a) Functional Co	urrency	(b) U.S. Dollars	by Column 4	(multiply column 5 by column 7)

JSA 0C2230 1,000

AS AMENDED GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX Form 1118 (Rev. 12-2009) Page 4 Schedule D

Tax Deemed Paid by First- and Second-Tier Foreign Corporations under Section 902(b)

Use Part I to compute the tax deemed paid by a first-lier foreign corporation with respect to dividends from a second-lier foreign corporation. Use Part II to compute the tax deemed paid by a second-tier foreign corporation with respect to dividends from a third-lier foreign corporation. Report all amounts in U.S. dollars unless otherwise specified. Part I - Tax Deemed Paid by First-Tier Foreign Corporations Section A - Dividends Paid Out of Post-1986 Undistributed Earnings (Include the column 10 results in Schedule C, Part I, column 6(b).) 7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), 4. Post-1986 Undistributed Earnin 5. Opening Balance in 9. Divide 10. Tax Deemed 8. Dividends Paid (in functional 2. Tax Year End (Yr-Mo) 3. Country of 6. Foreign Taxes Paid and Deemed 1. Name of Second-Tier Foreign incorporation (enter Pald for Tax Year Indicated currency) Paid (multiply (in function Corporation and its Related country code from instructions) B(a) by Column column 7 by Post-1986 Foreion (see instructions) (a) of Second-Ser (b) of First-tier (a) Taxes Paid First-Tier Foreign Corporation and 6(b)) Corporation Corporation 2555T/2777T 2010-12 GM 36,371,756 7,532,383 7,989,074 15,521,457 16,673,109 16,673,1090.458408 7,114,767 2569T/6643T 2010-12 524,633,515 7,741,280 UX 63,777,840 71,519,120 172,521 172,5210.000329 23,518 2674T/6643T 2010-12 UK 74,415,496 4,851,806 749,959 5,601,765 1,608,874 1,608,8740,021620 121,111 3144T/6643T 2005-12 UK-*PTI* 6,792,043 32,661 32,5610,004809 SEE STATEMENT Section B - Dividends Paid Out of Pre-1987 Accumulated Profits (Include the column 8(b) results in Schedule C, Part I, column 6(b).) 4. Accumulated Profits for 5. Foreign Taxes Paid and Deem Paid for Tax Year Indicated (in 6. Dividends Paid (in functional currency) 3. Country of 8. Tax Deemed Paid (see instructions) 2. Tax Yea 7. Divide 1. Name of Second-Tier Foreign End (Yr-Mo) incorporation (ente Tax Year Indicated Corporation and its Related First-Tier Foreign Corporation country code from instructions) (in functional curren attach schedule) (b) of First-tier (a) of Second-Ser 6(a) by (b) U.S. Dollars see instructions) Corporation Part II - Tax Deemed Paid by Second-Tier Foreign Corporations Section A - Dividends Paid Out of Post-1988 Undistributed Earnings (Include the column 10 results in Section A, column 6(b), of Pait I above.) 2. Tax Year End (Yr-Mo) 4. Post-1986 Istributed Earnings 5. Opening Balance in Post-1988 Foreign 6. Foreign Taxes Paid and De-7. Post-1988 Foreign Income Taxes 10. Tax Deems Paid (multiply 3. Country of 9, Divid 1. Name of Third-Tier Foreign Paid for Tax Year Indicated
(b) Taxes Deemer
Paid (from
Schedule E. Part I.
column 10) ncorporation (enter Column (in functional currency-attach schedule) Corporation and its Related (see instructions (a) of Third-tier (b) of Second-tie B(a) by column 7 by (a) Taxes Paid Second-Tier Foreign Corporation Income Taxes column 9) Section B - Dividends Paid Out of Pre-1987 Accumulated Profits (include the column 8(b) results in Section A, column 6(b), of Part I above.) 3. Country of Incorporation (enter 4. Accumulated Profits for 2. Tax Year End (Yr-Mo) 5. Foreign Taxes Paid and Deamed Paid for Tax Year Indicated (in 6. Dividends Paid (in f ncy) 7. Divide 8. Tax Deemed Paid (see instruct 1. Name of Third-Tier Foreign (a) in Functional Currency of Third-tier Corporation Tax Year indicated Corporation and its Related country code fram (a) of Third-tier (b) U.S. Dollars (see (In functional currency functional currency - see (b) of Second-ties 6(a) by Second-Tier Foreign Corporation Instructions) attach schedule) instructions)

Form 1118 (Rev. 12-2009)

OC2240 1.000

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

art I - Tax Deemed Paid by Thir 1. Name of Fourth-Tier Foreign	2. Tax Year End	3, Country of Incorporation (enter	4. Post-1986 Undistributed Earnings	5. Opening Balance in			7. Post-1988 Foreign Income	8, Dividen		9. Divide	10. Tax Deem Paid (multipl		
Corporation and its Related Third-Tier Foreign Corporation	(Yr-Mo) (see instructions)	country code from instructions)	(in functional currency - attach schedule)	Foreign Income Taxes	(a) Taxes Paid	(b) Taxes Desmed Paid (from Part II, column 10)	Taxes (add columns 5, 6(a), and 6(b))		(b) Of Third-lier CFC	8(a) by Column 4	column 7 by		
						COLUMN 101							
	1								-	-			
								1 200			-		
					-								
rt II - Tax Deemed Paid by Fou	rth-Tier Fore	ign Corporati	ons (Include the	column 10 r	esults in colu	ımn 6(b) of	Part I above	e.)		-			
1. Name of Fifth-Tier Foreign	2. Tex Year End	3. Country of Incorporation (enter	4. Post-1986 Undistributed Earnings	5. Opening Belance in		Paid and Deemed Year Indicated	Foreign Income		Dividends Paid (in functional currency)				10. Tax Dec
Corporation and its Related Fourth-Tier Foreign Corporation	(Yr-Mo) (see Instructions)	instructions)	(in functional currency - attach schedule)	Post-1985 Foreign Income Taxes	(a) Taxes Paid	(b) Taxes Deemed Paid (from Part III, dolumn 10)	Taxes (add columns 5, 8(a), and 8(b))	(a) Of Firth-tier CFC	(b) Of Fourth-tier CFC	8(a) by co	by column		
							-						
rt III - Tax Deemed Paid by Fif	th-Tier Forel	gn Corporation 3. Country of	ns (Include the d	5. Opening	1		art II above.	.) 8. Dividend	is Paid (in	9. Divide			
 Name of Sixth-Tier Foreign Corporation and its Related 	End (Yr-Mo)	Incorporation (enter	Undistributed Earnings (in functional	Post-1986	Paid For	gn Taxes Tax Year	Foreign Income Taxes (add	functional (a) Of Soth-tier		Column fi(a) by	Paid (multip column 7		
Fifth-Tier Foreign Corporation	(see instructions)	Instructions)	schedule)	Foreign Income Taxes	Indic	cated	columns 5 and 6)	CFC CFC	CFG	Column 4	by column		
	-	-				-							

Form 1118 (Rev. 12-2009)

JSA 0C2256 1.000

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

Sch	Gross Income and Branches	d Definitely Allocable De	ductions for Foreign	Sch	edule 6 Reductions of Taxes Paid, Accrued, or D	eemed Paid
	reign Country or U.S. Possession (Enter etter code from Schedule A, column 1. Use a separate line for each.)	2. Gross Income	3. Definitely Allocable Deductions	A	Reduction of Taxes Under Section 901(e) - Attach separate schedule	Ó
A	oc	1,607,357,806	328, 764, 349	В	Reduction of Foreign Oil and Gas Taxes - Enter amount from Schedule I, Part II, line 6	0
В				С	Reduction of Taxas Due to International Boycott Provisions - Enter appropriate portion of Schedule C (Form 5713), line 2b. Important: Enter only "specifically attributable taxes" here.	0
C				D	Reduction of Taxes for Section 6038(c) Penalty - Attach separate schedule	0
D				E	Other Reductions of Taxes - Attach schedule(s)	0
Ε						
F				+4	Water to the second of the sec	
Tota	Is (add lines A through F)*	1,607,357,806	328,764,349		at II, line 3	

* Note: The Schedule F totals are not carried own to any other Form 1118 Schedule. (These totals were already included in

Form 1118 (Rev. 12-2009)

JSA 0W99CD 1.000

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

Form 1118 (Rev. 12-2009)

Schedule H Apportionment of Deductions Not Definitely Allocable (complete only once)

Part I - Research and Development Deductions

				(a) Sales Method			(b) Gross Income Meth	od-Check method used:	1-1 T-1-(DAD
		Product line #1 (S	IC Code:138)*	Product line #2 (SIC	Code:	(v) Total R&D	Option 1	Option 2 Instructions.)	(c) Total R&D Deductions Not
		(i) Gross Sales	(ii) R&D Deductions	(III) Gross Sales	(iv) R&D Deductions	Deductions Under Sales Method (add columns (ii) and (iv))	(vi) Gross Income	(vii) Total R&D Deductions Under Gross Income Method	
1	Totals (see instructions)	38,504,323,123	255,783,706		94,632,552	350,416,258	0		or all amounts from column (b)(vii))
2	Total to be apportioned		127,891,853	4	47,316,276	175,208,129			
3	Apportionment among statutory groupings:								
а	General category income	2,798,519,419	9,295,264		29,235,412	38,530,675			38,530,675
b	Passive category income			0					
c	Section 901(j) income*		0						
d	Income re-sourced by treaty*								
4	Total foreign (add lines 3a through 3d)	2,798,519,419	9,295,264		29,235,412	38,530,675			38,530,675

^{*} Important: See Computer-Generated Schedule H in instruction

Form 1118 (Rev. 12-2009

JSA 0C2251 1.000

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

	(a) Average Value of Ass Fair market value X Atternative tax book	(b) Interest (Deductions	(c) All Other Deductions Not Definitely Allocable	(d) Totals (add the	
	(i) Nonfinancial Corporations	(ii) Financial Corporations	(III) Nonfinancial Corporations	(iv) Financial Corporations		amounts from column (c), Part I;
1 a Totals (see instructions)	17,312,464,155		447,750,940		338,973,927	columns (b)(iii) and (b)(iv), Part II; and
 b Amounts specifically allocable under Temp. Regs. 1.861-10T(e) 						column (c), Part II) Enter each amount from lines 3a through 3d below
c Other specific allocations under Temp. Regs. 1.861-10T			140,440,815			in column 10 of th corresponding Schedule A.
d Assets excluded from apportionment formula						Suredue A.
2 Total to be apportioned (subtract the sum of lines 1b, 1c, and 1d from line 1a)	17,312,464,155		307,310,125			
Apportionment among statutory groupings:			-		-	
a General category income	8,566,050,769		152,054,272		338,973,927	529,558,874
b Passive category income	226, 103, 426		4,013,517			4,013,51
c Section 901(j) income*	2,510,669		44,566			44,56
d Income re-sourced by treaty*			711	1		
4 Total foreign (add lines 3a through 3d)	8,794,664,864	19	156,112,355		338, 973, 927	533,616,957

JSA 0G2260 1 000

Case 4:24-cv-02149 Document 30 AS FAMOR DED 1/21/24 in TXSD Page 27 of 35 GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

Schedule J (Form 1118)

(Rev. January 2009)

Adjustments to Separate Limitation Income (Loss) Categories for Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances, and Overall Foreign and Domestic Loss Account Balances

For calendar year 2010 _ _ _ , or other tax year beginning _ _ _

OMB No. 1545-0122

Department of the Treasury Internal Revenue Service and ending _____

Attach to Form 1118. For Paperwork Reduction Act Notice, see the Instructions for Form 1118.

Employer identification number Name of corporation HALLIBURTON COMPANY Part I Adjustments to Separate Limitation Income or (Losses) in Determining Numerators of Limitation Fractions (see instructions) General category income U.S. income Passive category income Other income* 1 Income or (loss) before adjustments -2,914,080 -44,566 985, 455, 687 716,750,620 Allocation of separate limitation losses: a General category income b Passive category income 2,914,080) 2,914,080 c Other income* 44,566) 44,566 Subtotal - Combine lines 1 through 2c. 713,791,974 985, 455, 687 Allocation of overall foreign losses Allocation of domestic losses Subtotal - Combine lines 3 through 5. 713, 791, 974 985, 455, 687 7 Recapture of overall foreign losses 8 Subtotal - Combine lines 6 and 7. 713,791,974 985, 455, 687 9 Recharacterization of separate limitation income: a General category income b Passive category income c Other income* 10 Recapture of overall domestic losses -469,644,903 469,543,301 101,602 Numerator of Limitation Fraction -Combine lines 8 through 10. Enter each result here and on Schedule B, Part II, line 7, of corresponding Form 1118. 1,183,335,275 101,602 Part II Year-End Balances of Future Separate Limitation Income That Must Be Recharacterized (section 904(f)(5)(C)) a General category income b Passive category income 2,914,080 c Other income* 364, 351 2,804 Part III Overall Foreign Loss Account Balances (section 904(f)(1)) Complete for each separate limitation income category. Beginning balance 2 Current year additions Current year reductions (other than recapture) Current year recapture (from Part I, line 7) Ending balance - Combine lines 1 through 4. Part IV Overall Domestic Loss Account Balances (section 904(g)(1)) Beginning balance 648,569,233 140,340 Current year additions Current year reductions (other than recapture) Subtotal - Combine lines 1 through 3. 648,569,233 140,340 Current year recapture (from Part I, line 469,543,301 101,602 Ending balance - Subtract line 5

179,025,932

38,738

Schedule J (Form 1118) (Rev. 1-2009)

from line 4.

^{*} Important: See Computer-Generated Schedule J in instructions.

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

AS AMENDED

SCHEDULE K (Form 1118)	Fore	ign Tax Carry	over Recond	iliation Sche	dule				
- 10 marks 1						100	OMB No. 1545-0122		
De Con converte leuteretten							OMID 140. 1243-0122		
lepartment of the Treasury ► Attach to Form 1118.									
Name of corporation							Employer Identification Number		
HALLIBURTON COMPANY									
Use a separate Schedule K (Form 11 Passive Category Income x General Category Income	Section 90	fincome listed below 1(j) Income: Name o -sourced by Treaty: N	f Sanctioned Country	>					
Foreign Tax Carryover Reconciliation	(I) 101h Preceding Tax Year	(ii) 9th Preceding Tax Year	(iii) 6th Preceding Tax Year	(iv) 7th Preceding Tax Year	(v) 6th Preceding Tax Year	(vi) 5th Preceding Tax Year	(vii) Subtotal (add columns (i) through (vii)		
 Foreign tax carryover from the prior ta year (enter the amount from line 6 of the worksheet in the instructions) 	×								
 Adjustments to line 1 (enter description - see instructions): 							2		
a Carryback adjustment (see instructions)									
 Adjustments for section 905(c) redeterminations (see instructions) 									
C									
d									
e									
f		-							
Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2).									
4 Foreign tax carryover utilized in currer tax year (enter as a negative number									
5 Foreign tax carryover expired unused in current tax year (enter as a negative number)							4		
6 Foreign tax carryover generated in current tax year									
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)									
Foreign tax carryover to the following tax year. Combine lines 3 through 7.	0-								

Schedule K (Form 1118) (12-2009)

JSA 0C2257 1 000

GENERAL LIMITATION - ALTERNATIVE MINIMUM TAX

Foreign Tax Carryover Reconciliation (continued)	(vill) Subtotal from page 1 (enter the amounts from column (vii) on page 1)	(ix) 4th Preceding Tax Year	(x) 3rd Preceding Tax Year	(xi) 2nd Preceding Tax Year	(xii) 1st Preceding Tax Year	(xiii) Current Tax Year	(xiv) Totals (add columns (viii) through (xiii))
 Foreign tax carryover from the prior tax year (enter the amount from line 6 of the worksheet in the instructions) 					858,658,000		858,658,000
Adjustments to line 1 (enter description - see instructions):							
a Carryback adjustment (see instructions)							
b Adjustments for section 905(c) redeterminations (see instructions)			,				
C							
d							
8							
1						201	
g							
Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2). Enter the column (xiv) total on the current year Form 1118, Schedule B, Part II, line 5.					858,658,000		858,658,000
4 Foreign tax carryover utilized in current tax year (enter as a negative number)							
Foreign tax carryover expired unused in current tax year (enter as a negative number)							
6 Foreign tax carryover generated in current tax year						3,713,163	3,713,163
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
8 Foreign tax carryover to the following tax year. Combine lines 3 through 7.					858,658,000	3,713,163	862,371,16

Schedule K (Form 1118) (12-2009)

JSA 0C2258 1.000 Form 4626

Alternative Minimum Tax - Corporations

OMB No. 1545-0175

Department of the Treasury Internal Revenue Service See separate instructions.
 Attach to the corporation's tax return.

2010

Name Hall	Liburton Company	employe	Identification number
	Note: See the instructions to find out if the corporation is a small corporation exempt from the alternative minimum tax (AMT) under section 55(e).		W. 60 CO W
1	Taxable income or (loss) before net operating loss deduction	. 1	1,687,569,70
2	Adjustments and preferences:		
a	Depreciation of post-1986 property	. 2a	-5,123,383
b		2b	
c		2c	13,281,170
d		2d	
e	Adjusted gain or loss		-402,691
f		2f	
g	Merchant marine capital construction funds	. 2g	
h	Section 833(b) deduction (Blue Cross, Blue Shield, and similar type organizations only)	2h	
1	Tax shelter farm activities (personal service corporations only)	2i	
1	Passive activities (closely held corporations and personal service corporations only)	2j	
k	요. 없는 어래를 가지 않는 수 있는데 하나 가는데 그렇게 되었다. 그 아내는 그 아내는 그 그래요? 그리고 그는 그를 하는데 그리고 그래요? 그리고 그래요? 그리고 그래요?		
î			3,653
	Depletion	2 m	0/000
m			1,107,797
n	Intangible drilling costs	20	1/10///3/
	Other adjustments and preferences		1,696,436,253
3	Pre-adjustment alternative minimum taxable income (AMTI). Combine lines 1 through 20 ,	. 3	1,000,400,20
4	Adjusted current earnings (ACE) adjustment: ACE from line 10 of the ACE worksheet in the instructions 4a 1,700,184,79	Q .	
	The Little and the State and the State and the State and	2	
b	Subtract line 3 from line 4a. If line 3 exceeds line 4a, enter the difference		
	as a negative amount (see instructions)		
C	Multiply line 4b by 75% (.75). Enter the result as a positive amount 4c 2,811,408		1
d	Enter the excess, if any, of the corporation's total increases in AMTI from prior year ACE adjustments over its total reductions in AMTI from prior year ACE adjustments (see instructions). Note: You must enter an amount on line 4d (even if line 4b is positive)		
е	ACE adjustment.	#	15 TX 55
	 If line 4b is zero or more, enter the amount from line 4c If line 4b is less than zero, enter the smaller of line 4c or line 4d as a negative amount 	. 4e	2,811,408
5	Combine lines 3 and 4e. If zero or less, stop here; the corporation does not owe any AMT	. 5	1,699,247,661
6	Alternative tax net operating loss deduction (see instructions)	6	
7	Alternative minimum taxable income. Subtract line 6 from line 5. If the corporation held a residual		e ramasas
	interest in a REMIC, see instructions	. 7	1,699,247,661
8	Exemption phase-out (if line 7 is \$310,000 or more, skip lines 8a and 8b and enter -0- on line 8c):		
a	Subtract \$150,000 from line 7 (if completing this line for a member of a		
	controlled group, see instructions). If zero or less, enter -0		
b	Multiply line 8a by 25% (.25)		
	Exemption. Subtract line 8b from \$40,000 (if completing this line for a member of a controlled group		
	see instructions). If zero or less, enter -0-	5-1	and the second second
9	Subtract line 8c from line 7. If zero or less, enter -0-	9	1,699,247,661
0	Multiply line 9 by 20% (.20)		339,849,532
1	Alternative minimum tax foreign tax credit (AMTFTC) (see instructions)	11	236,667,136
2	Tentative minimum tax. Subtract line 11 from line 10.		103,182,396
3	Regular tax liability before applying all credits except the foreign tax credit		207,450,929
4	Alternative minimum tax. Subtract line 13 from line 12. If zero or less, enter -0 Enter here and on	1.0	33.1.331343
7	Form 1120, Schedule J, line 3, or the appropriate line of the corporation's income tax return	14	
		1.4	

Adjusted Current Earnings (ACE) Worksheet

See ACE Worksheet Instructions (which begin on page 8).

1	Pre-adjustment AMTI. Enter the amount from line 3 of Form 4626	1	1,696,436,253
2	ACE depreciation adjustment:		
a	AMT depreciation 2a 1,147,402,109		
b	ACE depreciation:		
	(1) Post-1993 property		
	(2) Post-1989, pre-1994 property		
	(3) Pre-1990 MACRS property		
	(4) Pre-1990 original ACRS property		
	(5) Property described in sections 168(f)(1) through		
	(4)		
	(6) Other property 2b(6) 1,142,104,234		
	(7) Total ACE depreciation. Add lines 2b(1) through 2b(6)		
c	ACE depreciation adjustment. Subtract line 2b(7) from line 2a	2 c	1,964,251
3	Inclusion in ACE of items included in earnings and profits (E&P):		
a	Tax-exempt interest income		
h	Death benefits from life insurance contracts		
c	All other distributions from life insurance contracts (including surrenders)		1
4	Inside buildup of undistributed income in life insurance contracts		
0	Other items (see Regulations sections 1.56(g)-1(c)(6)(iii) through (ix) for a partial		
e			
	Total increase to ACE from inclusion in ACE of items included in E&P. Add lines 3a through 3e	2.5	274,928
	이 사용은 그리고 있다면 하는데 말이 있다면 되었다면 하는데 그렇게 되었다. 그는데 그는데 그를 하나요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요	3f	2137320
4	Disallowance of items not deductible from E&P: Certain dividends received 406,033		
D	Dividends paid on certain preferred stock of public utilities that are deductible		
	under section 247		
C	Dividends paid to an ESOP that are deductible under section 404(k),		
d	Nonpatronage dividends that are paid and deductible under section 1382(c) 4d		
е	Other items (see Regulations sections 1.56(g)-1(d)(3)(i) and (ii) for a partial list) 4e		
f	Total increase to ACE because of disallowance of items not deductible from E&P. Add lines 4a through 4e	4f	406,033
5	Other adjustments based on rules for figuring E&P:		
a	Intangible drilling costs		
b	Circulation expenditures		
C	Organizational expenditures		
d	LIFO inventory adjustments		
8	Installment sales ,		
f	Total other E&P adjustments. Combine lines 5a through 5e	5f	
,	Disallowance of loss on exchange of debt pools	6	
,	Acquisition expenses of life insurance companies for qualified foreign contracts	7	
3	Depletion	8	
,	Basis adjustments in determining gain or loss from sale or exchange of pre-1994 property	9	1,103,333
	Adjusted current earnings. Combine lines 1, 2c, 3f, 4f, and 5f through 9. Enter the result here and on line		
~	4a of Form 4626	10	1,700,184,798

Form Department of the	ZU For a	alendar year 2	J.S. Corporation of tax year beginning	q	, ending			2011
nternal Revenue	id liddbuly I		▶ See s	eparate instr	uctions.			201
A Check if:	Name onsolidated return Litate Form 851) Halliburton Energy Services Inc						B Employer i	dentification nur
(attach Form b Life/nonlife	851). Print							
consolidated	Number, street, and room or suite no. If a P.O. box, see instructions. or 2107 City West Boulevard						C Date incom	
(attach Sch. Pl	H) type		A CONTRACTOR OF THE CONTRACTOR	rd				/1924
3 Personal servi corp. (see instr			state, and ZIP code					s (see instructions
4 Schedule M-3			TX 77042			$\overline{}$		3,751,734
attached				inal return (3)			s change	122 005 6
1 a or sale			b Less returns and allowances		8,691,369 c Bal l	_		133,925,0
2 Cost	t of goods sold (Sch	nedule A, line 8)				. 2		699,707,3
3 Gros	ss profit. Subtract li	ne 2 from line 10				, 3	٥,	434,217,7
4 Divid	dends (Schedule C,	line 19)				. 4		22,444,0 8,846,
5 Inter								163,
								121, 953,
1 0.00	s royalties	*****						5,005,5
8 Capi	tal gain net income	(attach Schedu	le D (Form 1120))			. 8	_	64, 492, 2
							-	-34, 325, 4
								622,797,0
						_	3,	43,191,
12 Com	pensation of officer	s (Schedule E, II	ne 4)			12		413, 114, 1
13 Salar	ries and wages (les	s employment cr	edits)	******		. 13		413,114,1
13 Salar 14 Repa 15 Bad	airs and maintenand	,	*******	*****		. 14		57, 139, 1
15 Bad	deots	• • • • • • • •	****	****	,,,,,,,,,,,,,	15		54,027,1
16 Rents	s and licenses	,,,,,,,,,	*********	******		16		277, 698, 8
17 Taxe 18 Interd 19 Char 20 Depr 21 Deple 22 Adve 23 Pens 24 Empl	s and licenses				,,,,,,,,,,,,	18	-	92,208,5
19 Char								4,114,5
20 Depr					n (attach Form 4562)		1.	091,113,5
21 Deple					and the second second second second second			5,838,2
22 Adve								5,941,4
23 Pens	tion profit-charing	atr plane	*******	******				43,089,3
24 Empl								72,320,4
25 Dome	estic production ac	tivities deduction	n (attach Form 8003)					118,728,9
								309,870,2
	deductions Add li	nes 12 through	26			27		968,655,
					ubtract line 27 from line 11			654,141,
1			(see instructions)	and the second s	11,217,797			
24 2000			C, line 20)		404,786	29c		11,622,5
30 Taxa			line 28 (see instructions)		ALTERNATION TO CO	30	1,	642,518,9
31 Total	tax (Schedule J, lin					31		
32 a 2009 o	overpayment credited	32a	*******					
b 2010 e	estimated tax payments.	32b						
C 2010 re	efund applied for on	32c () d i	3al ▶ 32d				
e Tax d	leposited with Form	7004		32e				
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	er penalties of perjury, I	declare that I have e	xamined this return, including acc taxpayer) is based on all informa	ompanying schedule	es and statements, and to the best er has any knowledge.	of my know	edge and belief,	it is true, correct,
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AFFIRMATIVE ADJUSTMENT

Halliburton Company & Subsuduaries

FEIN:

Tax Year Ending 12/31/2010

Basis for Nigeria Settlement Payment Deduction Claim

In the mid-1990s, four engineering firms, including M.W. Kellogg Company, formed a joint venture (the "Joint Venture") to bid on a project to construct liquefied natural gas processing plants in Bonny Island, Nigeria. The taxpayer ("Halliburton") was not part of the Joint Venture.

In September 1998, Halliburton acquired Dresser Industries Inc. ("Dresser"), which owned M.W. Kellogg Company. After the acquisition, M.W. Kellogg Company was combined with Halliburton's subsidiary, Brown & Root Inc., to form Kellogg, Brown & Root Inc., which later became Kellogg, Brown & Root, LLC, now a wholly-owned subsidiary of KBR Inc. (together with its subsidiaries and predecessor entities, "KBR"). Halliburton spun off KBR in April 2007. Since that time, Halliburton and KBR have been independent, publicly traded companies.

In or around 2009, following allegations of improper payments to government officials in Nigeria by the Joint Venture through the use of agents or subcontractors in connection with the Bonny Island project, the United States Securities & Exchange Commission ("SEC") and the Department of Justice ("DOJ"), investigated KBR and Halliburton under the Foreign Corrupt Practices Act ("FCPA") in order to ascertain their role(s) in the alleged improper payments. A subsidiary of KBR ultimately pleaded guilty to conspiring to violate the FCPA and to substantive counts relating to violations of the anti-bribery provisions of the FCPA.

The SEC argued that Halliburton also had liability under the FCPA because Halliburton allegedly failed to maintain and enforce its existing internal controls. There is no equivalent law in Nigeria.

KBR and Halliburton settled with the SEC and DOJ in 2009, making certain payments to the U.S. Government. On September 3, 2010, after the Federal Government of Nigeria ("FGN") learned of these settlements, the FGN filed charges in Nigeria against the members of the Joint Venture and other individuals and entities connected with the Bonny Island project. These charges filed by the FGN did not include Halliburton or any of Halliburton's officers, directors, or employees.

At the time of the September 2010 charges, KBR was no longer operating in Nigeria. By contrast, Halliburton had significant operations and employees in Nigeria.

Given that KBR no longer had employees or assets in Nigeria, the FGN next launched an aggressive campaign against Halliburton's business and employees. Among other actions, in late November and early December 2010 the FGN:

- Raided Halliburton's offices in Lagos, Nigeria;
- arrested or detained ten Halliburton employees;
- demanded in writing that the FGN be paid the same amount as other jurisdictions with respect to the Bonny Island project (specifically including the settlement payments made to the U.S. Government); and
- threatened in writing to "activate alternative steps" if its monetary demands were not met within 30 days.

Case 4:24-cv-02149 Document 30 Filed on 11/21/24 in TXSD Page 35 of 35 Halliburton was adamant that it bore no responsibility for the alleged actions of the Joint Venture and refused to capitulate to the FGN's monetary demands. In response, on December 7, 2010, the FGN filed charges against Halliburton and certain of its current and former executives, alleging criminal liability under anti-bribery laws.

Despite the charges filed by the FGN, neither Halliburton nor any of its current or former executives had any potential – let alone actual – criminal liability under Nigerian law. The charges filed by the FGN were demonstrably frivolous. Neither Halliburton nor any of its employees had any connection to the Joint Venture's actions in obtaining contracts relating to the Bonny Island project. And Halliburton did not have any liability as a matter of Nigerian law for the actions of the Joint Venture (or even for the actions of KBR). Halliburton's settlement of the FCPA matter with the U.S. Government could form no basis for liability under Nigerian law, which did not include any analogous provisions to the FCPA provisions applicable to Halliburton. Moreover, the FGN's charges failed to contain the *prima facie* proof of evidence required to be included under Nigerian law, and Halliburton could have successfully applied to have the charges pre-emptively quashed on that basis. The charges were also procedurally deficient in that there was no proof of service on Halliburton and its executives.

Despite being aware that it had no potential for any criminal liability or any fine or penalty under Nigerian law, Halliburton nevertheless needed to find a quick and comprehensive way to stop the FGN's campaign against Halliburton. Halliburton's business in Nigeria was being directly and severely disrupted by the FGN's actions. The FGN was interfering with Halliburton's ability to operate in Nigeria and to honor contracts with its customers. In addition, particularly given the FGN's raid of Halliburton's offices and arrest or detention of Halliburton's employees, Halliburton was concerned for the safety and well-being of its 750 employees in Nigeria. Time was of the essence to address this business crisis.

Consequently, to protect its Nigerian business and employees in Nigeria, Halliburton negotiated with the FGN, and the parties ultimately executed a settlement agreement (the "Settlement Agreement"). In the Settlement Agreement, the FGN agreed to the following demands made by Halliburton: (1) to immediately desist from harassing Halliburton's employees and officers; and (2) to take no steps to "enforce any exclusion, restriction, limitation, disadvantage or debarment which prevents [Halliburton] from actively pursuing [its] existing projects, pursuing [its] business, and bidding for other or further projects or work within Nigeria." Halliburton agreed to pay \$35,000,000 to the FGN pursuant to the Settlement Agreement, of which \$2,500,000 was a reimbursement of the FGN's legal fees. The Settlement Agreement confirms that the payment was made "ex gratia" — voluntarily and without legal obligation. Halliburton expressly denied wrongdoing. There is no mention of any fine or penalty in the Settlement Agreement.

Halliburton paid the \$32,500,000 (the "Settlement Payment") purely for business reasons, including (as expressly set forth in the Settlement Agreement) to stop the FGN's harassment of

its employees and the disruption of its business. Although Halliburton secured several broad promises from the FGN in the Settlement Agreement not to pursue any criminal charges or other civil actions in the future, the payment was not in lieu of any actual or potential fine or penalty. The payment was purely an ordinary and necessary business expense.

On audit, the IRS properly allowed Halliburton's deduction under IRC 162(a) for the \$2,500,000 Halliburton paid to the FGN to reimburse the FGN for its legal fees. However, the IRS disallowed any deduction for the \$32,500,000 Settlement Payment, arguing that the payment was "a fine or similar penalty paid to a government for the violation of any law" under IRC 162(f) (as in effect for Halliburton's 2010 taxable year). Because (i) the \$32,500,000 Settlement Payment was an ordinary and necessary expense paid or incurred by Halliburton during 2010 in carrying on a trade or business under IRC 162(a), (ii) the \$32,500,000 Settlement Payment was not "a fine or similar penalty paid to a government for the violation of any law" under IRC 162(f) (as in effect for Halliburton's 2010 taxable year), and (iii) no other provision of the IRC properly prevents Halliburton from deducting the \$32,500,000 under IRC 162(a), Halliburton is entitled to a refund of \$11,375,000, plus interest as allowed by law, as set forth in this amended return.